

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

HODELL-NATCO INDUSTRIES, INC.)	CASE NO. 1:08 CV 2755
)	
Plaintiff,)	JUDGE: LESLEY WELLS
)	
-vs-)	<u>JOINT MOTION FOR EXTENSION OF</u>
)	<u>SUMMARY JUDGMENT AND EXPERT</u>
SAP AMERICA, INC., et al.)	<u>DISCOVERY SCHEDULES</u>
)	
Defendants.)	

Plaintiff Hodell-Natco Industries, Inc. (“Hodell”), Defendants SAP America, Inc. and SAP AG (collectively, “SAP”), and Defendants LSI-Lowery Systems, Inc. and The IBIS Group, Inc. (collectively, “LSI”) jointly and through their respective undersigned attorneys, request an extension of the summary judgment briefing and expert discovery cutoff in this action as follows:

- (1) Plaintiff’s Summary Judgment Opposition due on or before October 12, 2012;
- (2) Defendants’ Reply Briefs due on or before October 26, 2012;
- (3) Discovery related to technology experts shall be concluded on or before November 16, 2012;
- (4) Parties will defer discovery related to damages experts until the establishment of a trial date and trial schedule.

The parties submit that the requested schedule is in the interests of justice, and is necessitated by the need to accommodate witness schedules in order to conclude depositions set in this action. The parties further submit that the requested schedule is not interposed for

purposes of delay, and that the parties have jointly discussed and agreed to the requested schedule.

Respectfully submitted,

/s/ P. Wesley Lambert

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CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of October, 2012, a copy of the foregoing was filed electronically. Parties may access this filing through the Court's electronic filing system.

/s/ P. Wesley Lambert

P. WESLEY LAMBERT (0076961)